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District of Nevada

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:11-CR-434-LDG-(PAL)
)	
Plaintiff,)	
)	
v.)	STIPULATED MOTION TO CONTINUE
)	DISCOVERY
EDUARD PETROIU, <i>et. al.</i> ,)	(Second Request)
)	
Defendant.)	

COME NOW the parties and stipulate and jointly move this Court to continue the discovery cut-off in the above-captioned case until September 30, 2016. The parties have already engaged in extensive ‘paper’ discovery including propounding interrogatories and requests for production of documents on the Claimants, which have been, more or less answered by the Claimants. The United States has received and analyzed this paper discovery and was prepared to depose both claimants, Atanas and Mariya Nedyalkova. However, Claimants’ counsel recently informed counsel for the Government that both Atanas and Mariya Nedyalkova are out of the country and will not return until early August 2016. Thus, the parties will not be able to conclude the discovery phase of this case until the Nedyalkovas return to the United States.

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1 Given the foregoing, the parties have agreed to request that this Court extend the discovery
2 cut-off deadline in this matter until September 30, 2016.

3 This motion is not submitted solely for the purpose to delay or for any other improper
4 purpose.

5 WHEREFORE, the parties move this Court to grant a continuance of the discovery cut-off
6 date until September 30, 2016, for the parties to complete discovery.

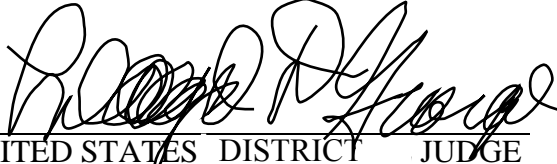
7 Dated this 9th day of May 2016.

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9 Respectfully submitted,

10 DANIEL G. BOGDEN
United States Attorney

11 /s/Michael A. Humphreys
12 MICHAEL A. HUMPHREYS

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15 IT IS SO ORDERED:

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17 
18 UNITED STATES DISTRICT JUDGE
19 LLOYD D. GEORGE
20 DATED: 13 May 2016
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